

Amendments to the Drawings:

The attached sheets of drawings include changes to Figures 1 and 2. These sheets, which include Figures 1 and 2, replace the original sheets including Figures 1 and 2. In both Figures 1 and 2, previously omitted legend "Prior Art" has been added.

Attachments: Replacement Sheets

Remarks

This Amendment and Response is in response to the Office Action dated July 15, 2004 wherein the Examiner informed Applicant that the Amendment and Response filed on May 28, 2004 (in response to the Office Action dated April 22, 2004) was considered non-compliant. Accordingly, this Amendment and Response is directed to the issues in the Office Action of April 22, 2004 in which the Examiner (a) objected to the drawings of Figures 1 and 2; and (b) rejected claims 1-20 under 35 U.S.C. § 103(a) as being unpatentable over Wordsworth et al (U.S. Patent No. 5,818,518) ("Wordsworth") in view of Morimoto (U.S. Patent No. 5,969,759) ("Morimoto").

The above identified Office Actions have been received, the references carefully considered, and the Examiner's comments carefully weighed. Applicant has amended claims 1, 8-10, 12, and 18-20. All the changes are made for clarification and are based on the application and drawings as originally filed. It is respectfully submitted that no new matter is added. It is contended that this response meets the requirements of 37 CFR 1.121 and all bases of rejection set forth in the Office Action dated April 22, 2004 have been traversed and overcome. Accordingly, reconsideration and allowance of all pending claims are respectfully requested in view of the following remarks.

Objections to the Drawings

Applicant has amended Figures 1 and 2 to include the legend "Prior Art" as directed by the Examiner. Accordingly, Applicant believes Figures 1 and 2 are no longer objectionable and request that Examiner rescind his objections thereto.

Rejection under 35 USC § 103

The Examiner has rejected claims 1-20 under 35 U.S.C. 103(a) as being unpatentable over Wordsworth in view of Morimoto. Applicant respectfully traverses such rejection, for the reasons set forth below.

Applicant respectfully disagrees that Wordsworth and Morimoto, whether alone or in combination, disclose (i) "a controller, said controller being capable of simultaneously directing storage of a first subset of said film image components onto said plurality of digital recording media and directing storage of a second subset of said film image components onto said common storage device" as provided for by claims 1-11; and (ii) the step of "simultaneously directing the storage of said independent data streams onto a plurality of digital recording media and a common storage device" as provided for by claims 12-20.

The Wordsworth reference is directed to a prior art apparatus for film transfer in which special processing of a sensed image and the raster scan line is moved so as to avoid the common problems associated with a small raster patch, e.g., poor image quality and burn-in of the image on the phosphor. The detected image signal is then processed in order to maintain the quality of the image. The Wordsworth reference is very different from Applicant's invention.

The Morimoto reference is directed to solid state image sensing device. Specifically, Morimoto is directed to a multi-output CCD solid state imaging sensing device. The device disclosed in Morimoto relates only to the image sensing device, and does not discuss the storage of the sensed image data. This reference does not disclose, teach or suggest the invention as claimed by Applicant.

Claims 1-11:

The invention as claimed by Applicant in claims 1-11 provides for an apparatus for converting film images to a digital format. The apparatus comprises, amongst other elements, a "controller" which is

capable of directing the storage of the sensed images onto a plurality of digital recording media while also storing previously stored images onto a common storage device. Neither reference, whether alone or in combination, discusses, discloses or suggests the invention provided for by claims 1-11.

Additionally, the Wordsworth and Morimoto references are not combinable. "To combine references (A) and (B) properly to reach the conclusion that the subject matter of a patent would have been obvious, case law requires that there must be some teaching, suggestion, or inference in either reference (A) or (B), or both, or knowledge generally available to one of ordinary skill in the relevant art that would lead one skilled in the art to combine the relevant teachings of references (A) and (B). Consideration must be given to teachings in the references that would have led one skilled in the art away from the claimed invention. A claim cannot properly be used as a blueprint for extracting individual teachings from references." Ashland Oil, Inc. v. Delta Resins & Refractories, Inc., 776 F.2d 281, 227 U.S.P.Q. 657 (Fed. Cir. 1985). There is no teaching, suggestion or inference in either Wordsworth or Morimoto that would lead one skilled in the art to combine the teachings of these references.

Further, even if combined, the Wordsworth and Morimoto references would not disclose the invention as claimed by Applicant. If combined, the combination of Wordsworth and Morimoto would teach a system that senses an image with Morimoto's disclosed image sensing device and processes that image according to the apparatus and method disclosed in Wordsworth. This is different from the invention as claimed by Applicant because, at a minimum, neither of these references discloses a controller that is capable of simultaneously directing the storage of sensed image data onto a digital recording media and onto a common storage device, as claimed by Applicant.

Claims 12-20:

The invention as claimed by Applicant in claims 12-20 provides for a method comprising the step of "simultaneously directing the storage of said independent data streams onto a plurality of digital

recording media and a common storage device". Neither Wordsworth nor Morimoto disclose, teach or suggest the invention as claimed by Applicant. Further, as discussed above, the Wordsworth and Morimoto references are not combinable and, even if combined, do not disclose, discuss or teach the invention as claimed in claims 12-20.

Conclusion

It is respectfully submitted that Applicant has responded in a fully satisfactory manner to all matters at issue in this Application, and that this Application is now in condition for allowance. In this regard, Applicant has made every effort to comply with the requirements set forth in the Office Actions as well as the statutory requirements. Accordingly, Applicant respectfully requests that the Examiner enter this Amendment, allow the Claims, and pass the Application to issue.

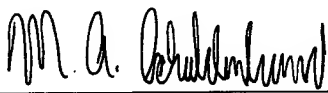
Applicant respectfully submits that Claims 1-20 are in a condition for allowance. If the Examiner believes that personal communication will expedite prosecution of this application, he is invited to telephone the undersigned at (248) 433-7570.

Prompt and favorable consideration of this amendment is respectfully requested.

Respectfully submitted,

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